

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO GRAPHIC ARTS HEALTH AND)
WELFARE PLAN; ROBERT MILLER and)
JAMES E. MADDEN, in their capacity as)
Trustees of the Chicago Graphic Arts Health)
and Welfare Plan, GRAPHIC)
COMMUNICATIONS CONFERENCE OF THE)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS SUPPLEMENTAL)
RETIREMENT AND DISABILITY FUND;)
GEORGE TEDESCHI, and PAUL)
ROSENBERG, in their capacity as Trustees of)
the GCC/IBT Supplemental Retirement and)
Disability Fund, and CARL J. LOSTRACCO,)
JOHN P. CAPUTO, THOMAS S. GEHR,)
ROBERT J. MUCCIANTI, DENNIS A.)
BETSANES, and DONALD J. ROTOR,)
ANDREW J. GEHR,)

Plaintiffs,)

v.)

UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)

Defendants.)

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF JOHN P. CAPUTO

STATE OF ILLINOIS)

COUNTY OF COOK)

John P. Caputo being first duly sworn on oath, deposes and states as follows:

1. I am a resident of 534 Glen Garry, Cary, Illinois 60013, and a member of the Graphic Communications Conference/ International Brotherhood of Teamsters Union, Chicago Local 458-M. For over thirty-two years, I worked as an employee for Unitech Prepress Solutions, Inc., performing lithographic production work. This affidavit is submitted in support of the plaintiffs' motion for default and damages.

2. For the weeks of May 21 and 28, 2007, I worked for 37.50 hours each week. To date, the Company has not paid my wages, which are owed for three weeks at the rate of \$30.11 per hour. As a result of this failure, I am owed \$1,129.12 in gross wages per week for a total of \$2,258.24 for two weeks.

3. On the last day of my employment at Unitech Prepress Solutions, Inc., I had accrued 187.5 hours of vacation time resulting in unpaid compensation of \$5,645.62.

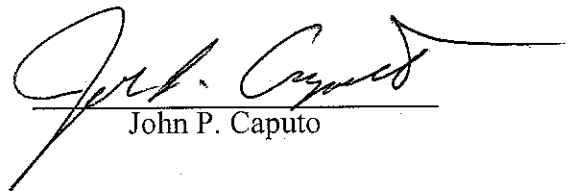
4. I am also aware that the Company was obligated to make deductions from my paycheck for contributions to the Inter-Local Pension Fund. For the period from March 31, 2007 through the my last paycheck received in May 2007, the deductions were taken out of each paycheck. The Company was also obligated to make deductions to the Inter-Local Pension Fund for the May 21 and May 28, 2007 pay periods.

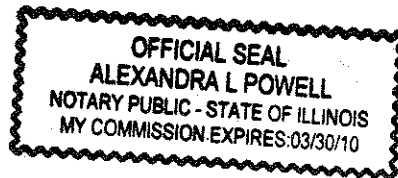
5. I am also aware that deductions were made for contributions to the GCC/IBT Health and Welfare Fund from my wages. For the period from December 2, 2006 through May 2007, pursuant to a withholding request, deductions were taken out of each paycheck for Health and Welfare contributions.

FURTHER AFFIANT SAYETH NOT.

Subscribed and sworn to before me
this 7 day of January 2008.

NOTARY PUBLIC


John P. Caputo



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**CHICAGO GRAPHIC ARTS HEALTH AND)
WELFARE PLAN; ROBERT MILLER and)
JAMES E. MADDEN, in their capacity as)
Trustees of the Chicago Graphic Arts Health)
and Welfare Plan, GRAPHIC)
COMMUNICATIONS CONFERENCE OF THE)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS SUPPLEMENTAL)
RETIREMENT AND DISABILITY FUND;)
GEORGE TEDESCHI, and PAUL)
ROSENBERG, in their capacity as Trustees of)
the GCC/IBT Supplemental Retirement and)
Disability Fund, and CARL J. LOSTRACCO,)
JOHN P. CAPUTO, THOMAS S. GEHR,)
ROBERT J. MUCCIANTI, DENNIS A.)
BETSANES, and DONALD J. ROTOR,)
ANDREW J. GEHR,)**

Plaintiffs,

v.

**UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)**

Defendants.

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF DENNIS BETSANES

STATE OF ILLINOIS)

COUNTY OF COOK)

Dennis Betsanes being first duly sworn on oath, deposes and states as follows:

1. I am a resident of Schaumburg, Illinois and a member of the Graphic Communications Conference/ International Brotherhood of Teamsters Union, Chicago Local 458-M. For over eighteen years, I worked as an employee for Unitech Prepress Solutions, Inc., performing lithographic production work. This affidavit is submitted in support of the plaintiffs' motion for default and damages.

2. For the weeks of May 21 and May 28, 2007, I worked for 37.50 hours each week. To date,

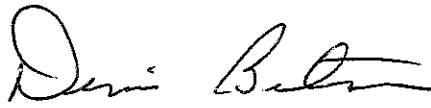
the Company has not paid my wages, which are owed for two weeks at the rate of \$29.11 per hour. As a result of this failure, I am owed \$1,091.63 in gross pay for each week or a total of \$2,183.26 for two weeks.

3. On the last day of my employment at Unitech Prepress Solutions, Inc., I had accrued 151 hours of vacation time resulting in unpaid compensation of \$4,395.61.

4. I am also aware that the Company was obligated to make deductions from my paycheck for contributions to the Inter-Local Pension Fund. For the period from March 31, 2007 through the my last paycheck received in May 2007, the deductions were taken out of each paycheck. The Company was also obligated to make deductions to the Inter-Local Pension Fund for the May 21 and May 28, 2007 pay periods.

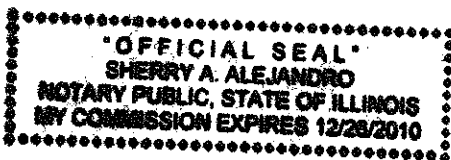
5. I am also aware that deductions were made for contributions to the GCC/IBT Health and Welfare Fund from my wages. For the period from December 2, 2006 through May 2007, pursuant to a withholding request, deductions were taken out of each paycheck for Health and Welfare contributions.

FURTHER AFFIANT SAYETH NOT.


Dennis Betsanes

Subscribed and sworn to before me
this 17 day of January 2008.


NOTARY PUBLIC



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**CHICAGO GRAPHIC ARTS HEALTH AND)
WELFARE PLAN; ROBERT MILLER and)
JAMES E. MADDEN, in their capacity as)
Trustees of the Chicago Graphic Arts Health)
and Welfare Plan, GRAPHIC)
COMMUNICATIONS CONFERENCE OF THE)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS SUPPLEMENTAL)
RETIREMENT AND DISABILITY FUND;)
GEORGE TEDESCHI, and PAUL)
ROSENBERG, in their capacity as Trustees of)
the GCC/IBT Supplemental Retirement and)
Disability Fund, and CARL J. LOSTRACCO,)
JOHN P. CAPUTO, THOMAS S. GEHR,)
ROBERT J. MUCCIANTI, DENNIS A.)
BETSANES, and DONALD J. ROTOR,)
ANDREW J. GEHR,)**

Plaintiffs,

v.

**UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)**

Defendants.

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF ANDREW GEHR

STATE OF ILLINOIS)

)

COUNTY OF COOK)

Andrew Gehr being first duly sworn on oath, deposes and states as follows:

1. I am a resident of 1216 W. Francis Drive, Arlington Heights, Illinois 60005, and a member of the Graphic Communications Conference/ International Brotherhood of Teamsters Union, Chicago Local 458-M. For over fourteen years, I worked as an employee for Unitech Prepress Solutions, Inc., performing lithographic production work. This affidavit is submitted in support of the plaintiffs' motion for default and damages.

2. For the weeks of May 14, 21 and 28, 2007, I worked for 37.50 hours each week, plus .25 in overtime during the week of May 14, 2007. To date, the Company has not paid my wages, which are owed for three weeks at the rate of \$29.58 per hour for straight time and \$44.37 for overtime hours. As a result of this failure, I am owed a total of \$3,338.84 for three weeks.

3. On the last day of my employment at Unitech Prepress Solutions, Inc., I had accrued 150 hours of vacation time resulting in unpaid compensation of \$4,437.00.

4. I am also aware that the Company was obligated to make deductions from my paycheck for contributions to the Inter-Local Pension Fund. For the period from March 31, 2007 through the my last paycheck received in May 2007, the deductions were taken out of each paycheck. The Company was also obligated to make deductions to the Inter-Local Pension Fund for the May 21 and May 28, 2007 pay periods.

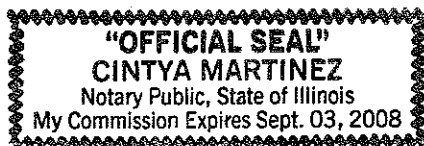
5. I am also aware that deductions were made for contributions to the GCC/IBT Health and Welfare Fund from my wages. For the period from December 2, 2006 through May 2007, pursuant to a withholding request, deductions were taken out of each paycheck for Health and Welfare contributions.

FURTHER AFFIANT SAYETH NOT.


Andrew Gehr

Subscribed and sworn to before me
this 5 day of ~~January~~ February, 2008.


NOTARY PUBLIC



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO GRAPHIC ARTS HEALTH AND)
WELFARE PLAN; ROBERT MILLER and)
JAMES E. MADDEN, in their capacity as)
Trustees of the Chicago Graphic Arts Health)
and Welfare Plan, GRAPHIC)
COMMUNICATIONS CONFERENCE OF THE)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS SUPPLEMENTAL)
RETIREMENT AND DISABILITY FUND;)
GEORGE TEDESCHI, and PAUL)
ROSENBERG, in their capacity as Trustees of)
the GCC/IBT Supplemental Retirement and)
Disability Fund, and CARL J. LOSTRACCO,)
JOHN P. CAPUTO, THOMAS S. GEHR,)
ROBERT J. MUCCIANTI, DENNIS A.)
BETSANES, and DONALD J. ROTOR,)
ANDREW J. GEHR,)

Plaintiffs,)

v.)

UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)

Defendants.)

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF THOMAS S. GEHR

STATE OF ILLINOIS)
)
COUNTY OF COOK)

Thomas S. Gehr being first duly sworn on oath, deposes and states as follows:

1. I am a resident of 420 Aster Lane, Hoffman Estates, Illinois 60195, and a member of the Graphic Communications Conference/ International Brotherhood of Teamsters Union, Chicago Local 458-M. For over thirty-four years, I worked as an employee for Unitech Prepress Solutions, Inc., performing lithographic production work. This affidavit is submitted in support of the plaintiffs' motion for default and damages.

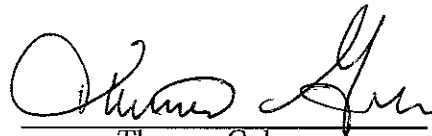
2. For the weeks of May 21 and 28, 2007, I worked for 37.50 hours each week. To date, the Company has not paid my wages, which are owed for two weeks at the rate of \$30.17 per hour. As a result of this failure, I am owed \$1,131.37 in gross wages per week for a total of \$2,262.74 for two weeks.

3. On the last day of my employment at Unitech Prepress Solutions, Inc., I had accrued 150 hours of vacation time resulting in unpaid compensation of \$4,525.48.

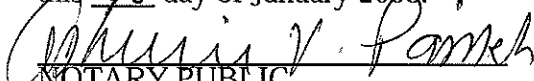
4. I am also aware that the Company was obligated to make deductions from my paycheck for contributions to the Inter-Local Pension Fund. For the period from March 31, 2007 through the my last paycheck received in May 2007, the deductions were taken out of each paycheck. The Company was also obligated to make deductions to the Inter-Local Pension Fund for the May 21 and May 28, 2007 pay periods.

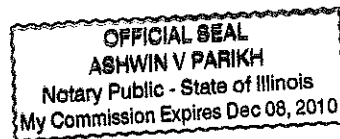
5. I am also aware that deductions were made for contributions to the GCC/IBT Health and Welfare Fund from my wages. For the period from December 2, 2006 through May 2007, pursuant to a withholding request, deductions were taken out of each paycheck for Health and Welfare contributions.

FURTHER AFFIANT SAYETH NOT.


Thomas Gehr

Subscribed and sworn to before me
this 08 day of January 2008.


NOTARY PUBLIC



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHICAGO GRAPHIC ARTS HEALTH AND WELFARE PLAN; ROBERT MILLER and JAMES E. MADDEN, in their capacity as Trustees of the Chicago Graphic Arts Health and Welfare Plan, GRAPHIC COMMUNICATIONS CONFERENCE OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS SUPPLEMENTAL RETIREMENT AND DISABILITY FUND; GEORGE TEDESCHI, and PAUL ROSENBERG, in their capacity as Trustees of the GCC/IBT Supplemental Retirement and Disability Fund, and CARL J. LOSTRACCO, JOHN P. CAPUTO, THOMAS S. GEHR, ROBERT J. MUCCIANTI, DENNIS A. BETSANES, and DONALD J. ROTOR, ANDREW J. GEHR,

Plaintiffs,

V.

**UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)**

Defendants.

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF CARL J. LOSTRACCO

STATE OF ILLINOIS)

COUNTY OF COOK)

Carl J. Lostracco being first duly sworn on oath, deposes and states as follows:

1. I am a resident of 331 S. Walnut Street, Itasca, Illinois 60143, and a member of the Graphic Communications Conference/ International Brotherhood of Teamsters Union, Chicago Local 458-M. For over thirty-eight years, I worked as an employee for Unitech Prepress Solutions, Inc., performing lithographic production work. This affidavit is submitted in support of the plaintiffs' motion for default and damages.

2. For the weeks of May 21 and 28, 2007, I worked for 37.50 hours each week. To date, the Company has not paid my wages, which are owed for two weeks at the rate of \$30.99 per hour. As a result of this failure, I am owed \$1,162.12 in gross wages per week for a total of \$2,324.24 for two weeks.

3. On the last day of my employment at Unitech Prepress Solutions, Inc., I had accrued 187.5 hours of vacation time resulting in unpaid compensation of \$5,810.62.

4. I am also aware that the Company was obligated to make deductions from my paycheck for contributions to the Inter-Local Pension Fund. For the period from March 31, 2007 through the my last paycheck received in May 2007, the deductions were taken out of each paycheck. The Company was also obligated to make deductions to the Inter-Local Pension Fund for the May 21 and May 28, 2007 pay periods.

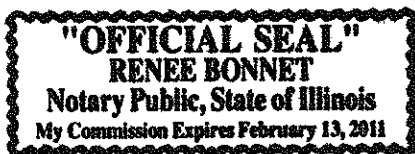
5. I am also aware that deductions were made for contributions to the GCC/IBT Health and Welfare Fund from my wages. For the period from December 2, 2006 through May 2007, pursuant to a withholding request, deductions were taken out of each paycheck for Health and Welfare contributions.

FURTHER AFFIANT SAYETH NOT.


Carl J. Lostracco

Subscribed and sworn to before me
this 7th day of January 2008.


NOTARY PUBLIC



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**CHICAGO GRAPHIC ARTS HEALTH AND)
WELFARE PLAN; ROBERT MILLER and)
JAMES E. MADDEN, in their capacity as)
Trustees of the Chicago Graphic Arts Health)
and Welfare Plan, GRAPHIC)
COMMUNICATIONS CONFERENCE OF THE)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS SUPPLEMENTAL)
RETIREMENT AND DISABILITY FUND;)
GEORGE TEDESCHI, and PAUL)
ROSENBERG, in their capacity as Trustees of)
the GCC/IBT Supplemental Retirement and)
Disability Fund, and CARL J. LOSTRACCO,)
JOHN P. CAPUTO, THOMAS S. GEHR,)
ROBERT J. MUCCIANTI, DENNIS A.)
BETSANES, and DONALD J. ROTOR,)
ANDREW J. GEHR,)**

Plaintiffs,

v.

**UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)**

Defendants.

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF ROBERT MUCCIANTI

STATE OF ILLINOIS)

COUNTY OF COOK)

Robert Muccianti being first duly sworn on oath, deposes and states as follows:

1. I am a resident of 10 South 576 Dunham Drive, Downers Grove, Illinois 60516, and I was a member of the Graphic Communications Conference/ International Brotherhood of Teamsters Union, Chicago Local 458-M. For over nineteen years, I worked as an employee for Unitech Prepress Solutions, Inc., performing lithographic production work. This affidavit is submitted in support of the plaintiffs' motion for default and damages.

2. For the weeks of May 21 and 28, 2007, I worked for 37.50 hours each week, plus four hours of overtime during the week of May 21, 2007. To date, the Company has not paid my wages, which are owed for two weeks at the rate of \$29.66 per hour, plus \$44.49 for overtime hours. As a result of this failure, I am owed \$1,112.25 in gross wages per week plus \$177.96 in overtime for a total of \$2,402.46 for two weeks.

3. On the last day of my employment at Unitech Prepress Solutions, Inc., I had accrued 150.0 hours of vacation time resulting in unpaid compensation of \$4,449.00.

4. I am also aware that the Company was obligated to make deductions from my paycheck for contributions to the Inter-Local Pension Fund. For the period from March 31, 2007 through the my last paycheck received in May 2007, the deductions were taken out of each paycheck. The Company was also obligated to make deductions to the Inter-Local Pension Fund for the May 21 and May 28, 2007 pay periods.

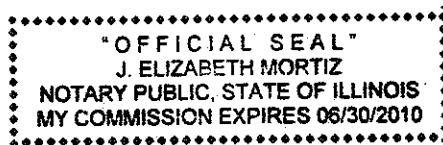
5. I am also aware that deductions were made for contributions to the GCC/IBT Health and Welfare Fund from my wages. For the period from December 2, 2006 through May 2007, pursuant to a withholding request, deductions were taken out of each paycheck for Health and Welfare contributions.

FURTHER AFFIANT SAYETH NOT.


Robert Muccianti

Subscribed and sworn to before me
this 21st day of January 2008.


NOTARY PUBLIC



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**CHICAGO GRAPHIC ARTS HEALTH AND)
WELFARE PLAN; ROBERT MILLER and)
JAMES E. MADDEN, in their capacity as)
Trustees of the Chicago Graphic Arts Health)
and Welfare Plan, GRAPHIC)
COMMUNICATIONS CONFERENCE OF THE)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS SUPPLEMENTAL)
RETIREMENT AND DISABILITY FUND;)
GEORGE TEDESCHI, and PAUL)
ROSENBERG, in their capacity as Trustees of)
the GCC/IBT Supplemental Retirement and)
Disability Fund, and CARL J. LOSTRACCO,)
JOHN P. CAPUTO, THOMAS S. GEHR,)
ROBERT J. MUCCIANTI, DENNIS A.)
BETSANES, and DONALD J. ROTOR,)
ANDREW J. GEHR,)**

Plaintiffs,

v.

**UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)**

Defendants.

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF DONALD J. ROTOR

STATE OF ILLINOIS)

COUNTY OF COOK)

Donald Rotor being first duly sworn on oath, deposes and states as follows:

1. I am a resident of 7541 Brookside Drive, Hanover Park, Illinois 60133. I am a member of the Graphic Communications Conference/ International Brotherhood of Teamsters Union, Chicago Local 458-M. For over thirty-five years, I worked as an employee for Unitech Prepress Solutions, Inc., performing lithographic production work. This affidavit is submitted in support of the plaintiffs' motion for default and damages.

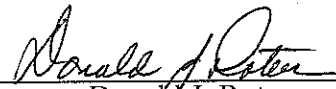
2. For the weeks of May 21 and May 28, 2007, I worked for 37.50 hours each week. To date, the Company has not paid my wages, which are owed for two weeks at the rate of \$28.71 per hour. As a result of this failure, I am owed \$1,076.63 in gross pay for each week or a total of \$2,153.26 for two weeks.

3. On the last day of my employment at Unitech Prepress Solutions, Inc., I had accrued 26 days of vacation time resulting in unpaid compensation of \$5,598.45.

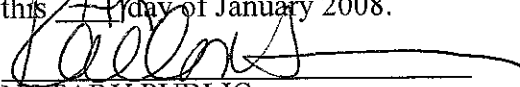
4. I am also aware that the Company was obligated to make deductions from my paycheck for contributions to the Inter-Local Pension Fund. For the period from April 7, 2007 through the my last paycheck received in May 2007, the deductions were taken out of each paycheck. The Company was also obligated to make deductions to the Inter-Local Pension Fund for the May 21 and May 28, 2007 pay periods.

5. I am also aware that deductions were made for contributions to the GCC/IBT Health and Welfare Fund from my wages. For the period from December 2, 2006 through May 2007, pursuant to a withholding request, deductions were taken out of each paycheck for Health and Welfare contributions.

FURTHER AFFIANT SAYETH NOT.


Donald J. Rotor

Subscribed and sworn to before me
this 7th day of January 2008.


NOTARY PUBLIC

